

EXHIBIT 151

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,

Defendants.

- - - - - x

C O N F I D E N T I A L

Videotaped oral deposition of
MARYANNE RYAN taken pursuant to notice,
was held at BOIES SCHILLER FLEXNER LLP,
commencing May 24, 2023, 9:39 a.m., on
the above date, before Leslie Fagin, a
Court Reporter and Notary Public in the
State of New York.

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2 retention. So Phil was of the mindset, as 11:23:44
3 was I, that he had to go. 11:23:49

4 Q. Why did you think he had to go? 11:23:52

5 A. He was a reputational risk to the 11:23:57
6 bank. 11:24:00

7 Q. Why was it a reputational risk to 11:24:01
8 the bank? 11:24:04

9 A. Any client that would be 11:24:05
10 consistently in the news for any variety of 11:24:10
11 reasons would present reputational risk to 11:24:15
12 the bank. 11:24:18

13 Q. But in this particular instance, 11:24:18
14 what was the reputational risk to the bank? 11:24:20

15 A. There were allegations and there 11:24:23
16 was a conviction about improper behavior with 11:24:25
17 a minor. 11:24:30

18 Q. And at that time you believed those 11:24:35
19 allegations? 11:24:39

20 MR. KRAUSE: Objection. 11:24:41

21 A. I had no firsthand knowledge. I 11:24:45
22 was reading what I read in the paper, and I 11:24:47
23 thought it was disturbing enough that the 11:24:50
24 customer should be re-reviewed for exit 11:24:53
25 determination by JPMorgan. 11:24:57

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2 know what -- I didn't know what Cutler knew 13:26:08

3 or didn't know about the bank's HT work. 13:26:10

4 Q. I'm just trying to understand why 13:26:16

5 you think Steve Cutler may feel differently, 13:26:21

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

10 MR. KRAUSE: Objection. Asked and 13:26:37

11 answered. 13:26:39

12 A. We were trying to get him out on 13:26:39

13 reputational risk reasons. Marrying together 13:26:44

14 the current work that the department was 13:26:49

15 doing, coupled with his old approval would 13:26:54

16 have given him a complete picture to 13:26:57

17 reapprove or relook at whether or not he was 13:27:00

18 still comfortable. 13:27:02

19 Q. You then write, I circled back with 13:27:04

20 PB and that was the reason for the RR meeting 13:27:07

21 on Friday. Seems -- no, let's stop there. 13:27:12

22 I will restate that. You write, I 13:27:19

23 circled back with PB and that was the reason 13:27:21

24 for the RR meeting on Friday. 13:27:23

25 Do you see that? 13:27:26

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2 that if it were up to them, they would have 13:31:13

3 terminated their relationship with Jeffrey 13:31:16

4 Epstein? 13:31:19

5 MR. WOHLGEMUTH: Objection. 13:31:19

6 A. I don't recall anything specific 13:31:21

7 said. 13:31:24

8 Q. You then write, Digging will take a 13:31:35

9 few days, I will get back to you when I am 13:31:38

10 done. The guy likes cash so the paper trail 13:31:40

11 could be hard. 13:31:48

12 Do you see that? 13:31:50

13 A. I do. 13:31:50

14 Q. What did you mean when you said, 13:31:50

15 the guy likes cash so the paper trail could 13:31:53

16 be hard? 13:31:56

17 A. As I recall, there were not credit 13:32:01

18 cards activity so I couldn't place people in 13:32:10

19 places at a certain time which is something 13:32:16

20 we might look at credit card data for because 13:32:18

21 paid -- he took out a lot of cash. 13:32:22

■ ■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED] [REDACTED] [REDACTED]
■ ■ [REDACTED] [REDACTED]

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[REDACTED]

11 MR. LAW: This will be Exhibit 10, 13:33:41

12 Bates number JPM-SDNYLIT-W-00021929. 13:33:43

13 (Ryan Exhibit 10, Email Chain, 13:33:54

14 marked for identification.) 13:33:54

15 THE WITNESS: Okay. 13:34:59

[REDACTED]

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[REDACTED]

19 MR. LAW: This is Exhibit 11, Bates 13:43:13

20 number JPM-SDNYLIT-00194154. 13:43:16

21 (Ryan Exhibit 11, Email, marked for 13:43:24

22 identification.) 13:43:47

23 THE WITNESS: Okay. 13:43:47

24 Q. This is an email from you, Maryanne 13:43:48

25 Ryan, to Phillip DeLuca on November 29, 2011, 13:43:53

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[illegible]

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[illegible]

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2 Q. When you say some other interesting 17:09:09

3 finds but no smoking guns were. 17:09:13

4 Do you see that? 17:09:16

5 A. Yes. 17:09:16

6 Q. What did you mean by, other 17:09:17

7 interesting finds? 17:09:23

8 MR. KRAUSE: Objection. 17:09:28

9 A. Just other things I noticed that I 17:09:29

10 was including so he could have other facts 17:09:32

11 when he went to speak to Jes. 17:09:42

12 Q. What was interesting about these 17:09:44

13 finds? 17:09:47

14 A. I mean he sponsored other customers 17:09:51

15 to the bank, saw different payments, no huge 17:10:08

16 amounts. I referred to him as a sugar daddy. 17:10:14

17 His foundation began paying donations to the 17:10:19

18 Palm Beach police department down in Florida, 17:10:26

19 around -- as reported, just before the case 17:10:31

20 started; paid other monies to different 17:10:33

21 schools, nothing -- no astronomical payments. 17:10:36

22 And I noticed that his business 17:10:41

23 account, I saw no credits and debits to 17:10:43

24 particular investors of his. He sent a lot 17:10:48

25 of money to his local Palm Beach bank 17:10:54

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2 account. 17:11:00

3 Q. So those were the finds, correct? 17:11:00

4 A. Correct. 17:11:05

5 Q. What was interesting about those 17:11:05

6 finds? 17:11:08

7 A. Just terminology I applied to it. 17:11:10

8 Nothing -- nothing underhanded about, I just 17:11:14

9 thought they were things I told William as he 17:11:20

10 prepared for that meeting. 17:11:22

11 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] why do you 17:11:26

13 think you needed to tell William about these 17:11:29

14 finds? 17:11:33

15 MR. KRAUSE: Objection. 17:11:35

16 A. He was meeting with Jes about 17:11:37

17 retaining Epstein as a customer. So there 17:11:39

18 were different facts that I thought I should 17:11:44

19 pass on to William beforehand. 17:11:46

20 Q. So for example, if we look at No. 17:11:52

21 2, where you say, His foundation account did 17:11:57

22 pay donations to the Palm Beach police 17:11:59

23 department as reported just before the case 17:12:02

24 started, this same foundation account did pay 17:12:04

25 monies direct to models and payments direct 17:12:08

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2 to specialty schools (massage, culinary) and 17:12:11

3 universities on behalf of models/aspiring 17:12:19

4 actresses, nothing was astronomical. 17:12:24

5 Do you see that? 17:12:29

6 A. I do. 17:12:29

7 Q. Were you aware in 2011 that Jeffrey 17:12:29

8 Epstein was alleged to commit sexual 17:12:37

9 misconduct in relation to massages? 17:12:42

10 A. I don't know when I became aware of 17:12:53

11 certain things. There has been so much press 17:12:57

12 that -- throughout the years, I can't speak 17:13:00

13 to exact moment that I heard about different 17:13:03

14 allegations. 17:13:07

15 Q. Were you aware in 2011 that Jeffrey 17:13:08

16 Epstein's sexual misconduct often involved 17:13:17

17 models and aspiring actresses? 17:13:23

18 MR. KRAUSE: Objection. 17:13:28

19 A. I don't -- I don't recall what I 17:13:29

20 read or didn't read about the people he 17:13:35

21 associated to. 17:13:38

■ ■ [REDACTED] ■

■ [REDACTED] ■

■ [REDACTED] ■

■ [REDACTED] ■

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17:13:55

[illegible]

The diagram illustrates a sequence of 10 horizontal bars, arranged in two columns of five. The bars represent a timeline or process flow. The first column has bars of lengths approximately 1, 2, 3, 4, and 5 units. The second column has bars of lengths approximately 1, 2, 3, 4, and 5 units. The bars are connected by vertical lines, suggesting a continuous process.

25 establishments, end quote? 17:16:39

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2 A. They spent, he didn't spend. 17:16:50

3 Q. Did you find it unusual that they 17:16:59

4 spent a good deal at spa establishments? 17:17:02

5 A. No. 17:17:08

6 Q. Looking at the beginning of find 17:17:25

7 No. 1, you say, the opening of DDA accounts 17:17:27

8 and a CC for two 18-year-olds turned 19 days 17:17:32

9 later, that appear to be part of his inner 17:17:39

10 entourage. One is mentioned in many of the 17:17:43

11 recaps of the escapades as a willing 17:17:45

12 participant and assistant when hosting 17:17:48

13 visitors. She has received about 450,000 17:17:50

14 since opening from Epstein. 17:17:53

15 Do you see that? 17:17:56

16 A. I do. 17:17:56

17 Q. Did you find it unusual that a man 17:17:57

18 over 50 years old was opening accounts for 17:18:02

19 18-year-old women who were not his relatives? 17:18:09

20 A. If they were significant other to 17:18:18

21 him, no, I would not have found that unusual. 17:18:21

22 Q. Did you find it unusual that a 17:18:25

23 willing participant of the escapades was paid 17:18:30

24 450,000 from Epstein? 17:18:37

25 A. I'm not sure which article this is 17:18:46

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2 referring to. The way -- the way I phrased 17:18:51
3 it, if we are referring to that person 17:18:54
4 earlier that I looked at, that was in another 17:18:57
5 email, if -- I thought she was his 17:19:01
6 significant other and she was routinely 17:19:09
7 gifted money from Epstein and had her own 17:19:11
8 account with her own credit card, which had 17:19:15
9 no strings; meaning he didn't control it. 17:19:17
10 She came and went with the banker however she 17:19:20
11 would see fit, that did not appear that 17:19:22
12 unusual to me. 17:19:26

13 Q. If you learned that she was not his 17:19:27
14 significant other, would it have appeared 17:19:29
15 unusual to you? 17:19:33

16 A. I would have found it very unusual 17:19:33
17 that he would have sponsored somebody for the 17:19:36
18 private bank to independently operate if -- 17:19:38
19 that would not fit a fact pattern of somebody 17:19:46
20 that was controlling somebody to me. 17:19:50

21 Q. Are you aware of anyone at the bank 17:19:52
22 asking Jeffrey Epstein whether these women 17:19:56
23 were his significant others? 17:20:00

24 A. I am not aware of what led to the 17:20:04
25 opening of these accounts. 17:20:08